

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
Jointly Administered

Re: Docket No. 14092

**THE LAW OFFICES OF PETER G. ANGELOS, P.C.'S MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO THE W.R. GRACE ASBESTOS PERSONAL INJURY QUESTIONNAIRE**

The Law Offices of Peter G. Angelos, P.C. (“Angelos”), on behalf of its clients, appearing by and through its undersigned attorneys, hereby files the following Motion for an Extension of Time to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire (the “Motion”) and would respectfully show the Court as follows:

Angelos submits the attached Declaration of Armand J. Volta, Jr. in support of the Motion.

Angelos will be supplementing questionnaires on behalf of around 5200 claimants. Angelos intends to provide these questionnaire responses in compliance with this Court's rulings, and have made a good faith effort to provide the

questionnaires to Grace before the January 12, 2007 deadline.¹ Despite this effort, Angelos will be unable to complete this undertaking before the deadline. Attorneys and staff have been working six to seven days a week to comply with the Court's order and properly and accurately supplement the questionnaire responses. Even given this effort, however, with 5200 questionnaires to complete, it is a physical impossibility to finish the task before January 12, 2007.

Angelos respectfully requests an additional 14 days to fully comply with the required questionnaire supplementation. Angelos undertakes to exercise appropriate diligence to send completed questionnaires to Rust Consulting as quickly as reasonably possible and, in any event, before January 26, 2007.

WHEREFORE, for the foregoing reasons Angelos prays that it be granted an additional 14 days to supplement questionnaires on behalf of its clients.

¹ As this Court noted in another context: "As I had indicated earlier, you know, some of these firms have an awful lot of claims. They may not be able to make the deadline, but I want some good faith efforts to do it." Transcript of omnibus hearing held on December 18, 2006, at page 42 (Docket No. 14205).

Dated: January 11, 2007

Sander L. Esserman
Van J. Hooker
David A. Klingler
David J. Parsons
**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA,
A Professional Corporation**
2323 Bryan Street, Suite 2200
Dallas, Texas 75201
Telephone: (214) 969-4900
Facsimile: (214) 969-4999

**COUNSEL FOR THE LAW OFFICES
OF PETER G. ANGELOS, P.C.**

/s/ Daniel K. Hogan
Daniel K. Hogan (ID no. 2814)
THE HOGAN FIRM
1311 Delaware Avenue
Wilmington, Delaware 19806
Telephone: (302) 656-7540
Facsimile: (302) 656-7599
E-mail: dan@dkhogan.com

**LOCAL COUNSEL FOR THE LAW
OFFICES OF PETER G. ANGELOS, P.C.**